

# **EXHIBIT 16**

**From:** Yotam Barkai

**Sent:** Wednesday, November 20, 2019 9:38 PM

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**Cc:** Jessica Phillips <jphillips@bsfllp.com>; Yotam Barkai <ybarkai@bsfllp.com>

**Subject:** Sines v. Kessler: Notice of Deposition

Please see the attached Notice of Deposition of Burt Colucci.

**Yotam Barkai**

Associate

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**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL,  
APRIL MUNIZ, HANNAH PEARCE,  
MARCUS MARTIN, NATALIE ROMERO,  
CHELSEA ALVARADO, JOHN DOE, and  
THOMAS BAKER,

Plaintiffs,

**Civil Action No. 3:17-cv-00072-NKM**

v.

JASON KESSLER, et al.,

Defendants.

**PLAINTIFFS' NOTICE OF DEPOSITION OF BURT COLUCCI**

PLEASE TAKE NOTICE pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure and the Court's Order dated October 28, 2019, that Plaintiffs, by and through their undersigned counsel, will take the deposition upon oral examination of Burt Colucci at 9:00 a.m. on Tuesday, December 10, 2019, and continuing from day to day thereafter until completed, before a notary public or other person authorized by law to administer oaths. The deposition will take place in Courtroom 416 of the George E. Edgecomb Courthouse, Thirteenth Judicial Circuit, 800 East Twiggs Street, Tampa, Florida 33602. The deposition will be recorded by stenographic means, by video, and through instant visual display of testimony by means of LiveNote or other similar technology. The deposition may be used to preserve testimony for trial, to obtain discovery, and for any other purpose authorized by the Federal Rules of Civil Procedure. You are invited to attend and cross-examine.

Dated: November 20, 2019  
Washington, D.C.

/s/ Jessica E. Phillips

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2019, I served the foregoing via electronic mail to:

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